

UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF RHODE ISLAND

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Sonya Robinson-Gibbs on behalf of herself  
and those similarly situated,

Plaintiffs,

v.

Case No. 1:13-cv-00182-M-PAS

RBS Citizens, N.A., d/b/a CCO Mortgage,  
Charter One, and Citizens Bank,

Defendant.

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**DECLARATION OF R. ANDREW SANTILLO**

R. Andrew Santillo, states on personal knowledge and under penalty of perjury:

1. I am a partner at the law firm of Winebrake & Santillo, LLC<sup>1</sup> (“W&S”) and am one of the attorneys representing Plaintiffs in the above-captioned action.

2. I am an attorney in good standing with the State Bars of Pennsylvania and New Jersey.

3. W&S has been recognized by state and federal judges in Pennsylvania and elsewhere as a law firm with particular experience in the field of wage and overtime rights litigation. Recently, in *Cuevas v. Citizens Financial Group*, 2011 U.S. Dist. LEXIS 155160, \*18 (E.D.N.Y. May 22, 2012), Senior Judge Frederic Block appointed W&S to serve as co-class counsel and recognized that W&S “ha[s] been appointed class counsel for dozens of wage and hour class claims across the country.” Further, in a recent nationwide FLSA class/collective action recently approved by the Middle District of Pennsylvania, Judge John E. Jones stated that

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<sup>1</sup> Formerly “The Winebrake Law Firm, LLC”

W&S and its co-counsel “are experienced wage and hour class action litigators with decades of accomplished complex class action between them and that the Class Members have benefitted tremendously from able counsel’s representation.” *Craig v. Rite Aid Corp.*, 2013 U.S. Dist. LEXIS 2658, \*45 (M.D. Pa. Jan. 7, 2013).

4. As indicated by the spreadsheet attached as Exhibit 1, W&S has successfully represented employees in 56 separate class/collective actions that have been resolved in various courts throughout the United States within the last seven years. In addition, W&S currently represents employees in over 40 class/collective actions pending in courts throughout the United States.

5. W&S also represents employees in “individual” actions in which single employees or small groups of employees allege violations of wage and overtime laws. Since January 2007, W&S has successfully resolved well over 100 such actions.

6. Based on this experience, we are convinced that this settlement is fair and reasonable.

7. W&S is comprised of three attorneys: Peter Winebrake (Partner), R. Andrew Santillo (Partner), and Mark J. Gottesfeld (Associate). Information concerning these attorneys’ general profiles, work histories, and educational backgrounds is accurately summarized in the “Attorney Profile” pages of W&S’s website, which can be found at [www.winebrakelaw.com](http://www.winebrakelaw.com). Copies of these pages are attached hereto as Exhibit 2.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 16, 2013

/s/R. Andrew Santillo  
R. Andrew Santillo, Esq

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**Counsel for Plaintiffs**

# Exhibit 1

## Winebrake &amp; Santillo, LLC - Class/Collective Wage and Overtime Settlements and Judgments

<u>Case Name</u>	<u>Court</u>	<u>Judge</u>	<u>Date of Approval/Judgment</u>	<u>Type</u>	<u>Co-Counsel?</u>
Ortiz v. Restoration Architecture, LLC, 4:05-cv-02624-JEJ	M.D. Pa.	John E. Jones, III	11/7/2006	Collective	No
Otto v. Pocono Medical Center, 4:06-cv-01186-JEJ	M.D. Pa.	John E. Jones, III	5/4/2007	Collective	No
Miller v. Antenna Star Satellites, Inc., 3:06-cv-00647-ARC	M.D. Pa.	A. Richard Caputo	5/29/2007	Collective	Yes
Sisko v. Wegmans Food Markets, Inc., 3:06-cv-00433-JMM	M.D. Pa.	James M. Munley	8/27/2007	Class	No
Evans/Smith, v. Lowe's Home Centers, Inc., 3:03-cv-00438/3:03-cv-00384-ARC	M.D. Pa.	A. Richard Caputo	9/4/2007	Collective	Yes
Diehl/Smith v. Lowe's Home Centers, Inc., 3:06-cv-01464/3:03-cv-00384-ARC	M.D. Pa.	A. Richard Caputo	1/4/2008	Class	Yes
Malec v. Kost Tire & Muffler, et al., 3:07-cv-00864-ARC	M.D. Pa.	A. Richard Caputo	1/2/2008	Collective	No
Dunn v. National Beef Packing Company, LLC, 4:07-cv-01599-JEJ	M.D. Pa.	John E. Jones, III	5/27/2008	Collective	No
Blasi v. United Financial Management Group, Inc., 3:06-cv-01519-JMM	M.D. Pa.	James M. Munley	6/19/2008	Collective	No
Palmer v. Michael Foods, Inc., 3:07-cv-02136-TIV	M.D. Pa.	Thomas L. Vanaskie	11/25/2008	Collective	No
Coluccio v. U.S. Remodelers, Inc., 1:09-cv-00819-JHR	D.N.J.	Joseph H. Rodriguez	12/15/2009	Collective	No
Shabazz v. Asurion Corporation, 3:07-cv-00653-AT	M.D. Tenn.	Aleta A. Trauger	2/26/2009	Collective	Yes
In re Cargill Meat Solutions Corp. Wage and Hour Litig., 3:06-cv-00513-WJN	M.D. Pa.	William J. Nealon	3/6/2009	Collective	Yes
Golpe v. The Wedge Medical Center, P.C., 2:08-cv-04504-JF	E.D. Pa.	John P. Fullam	3/11/2009	Collective	No
Banks v. New Vitae, Inc. and Tri County Respite, Inc., 5:08-cv-04212-LS	E.D. Pa.	Lawrence F. Stengel	3/26/2009	Collective	No
Weatherly v. Michael Foods, Inc., 8:08-cv-00153-JFB	D. Neb.	Joseph F. Bataillon	4/15/2009	Collective	Yes
Gallagher v. Bayada Nurses, Inc., No. 000392 (October 2007 Term)	Phila.C.C.P.	Idee C. Fox	4/21/2009	Class	No
Ray v. Krapf's Coaches, Inc., 2:08-cv-05097-DS	E.D. Pa.	David R. Strawbridge	9/10/2009	Collective	No
Miller v. Titanium Metals Corporation, 2:07-cv-04759-GP	E.D. Pa.	Gene E.K. Prattler	9/30/2009	Collective	No
Mayan v. Rydholm Express, Inc., 2:07-cv-02658-LS	E.D. Pa.	Lawrence F. Stengel	12/2/2009	Collective	No
Herd v. Specialty Surfaces International, Inc., 2:08-cv-01790-JCJ	E.D. Pa.	J. Curtis Joyner	1/26/2010	Collective	No
Morales v. Aaron Healthcare, Inc., 2008-C-5128	Lehigh C.C.P.	Brian Johnson	2/1/2010	Class	No
In re Pilgrim's Pride Fair Labor Standards Act Litig., 1:06-cv-01832-HFB	W.D. Ark.	Harry F. Barnes	4/2/2010	Collective	Yes
Williams v. Owens & Minor, Inc., 2:09-cv-00742-JD	E.D. Pa.	Jan E. Dubois	7/28/2010	Collective	No
Crisostomo v. Exclusive Detailing, Inc., 2:08-cv-01771-SRC-MAS	D.N.J.	Michael A. Shipp	9/15/2010	Collective	Yes
Gallagher v. Lackawanna County, 3:07-cv-00912-CCC	M.D. Pa.	Christopher C. Connor	10/5/2010	Collective	No
Herrarte v. Joe Jurgielewicz & Sons, Ltd., 5:09-cv-02683-RK	E.D. Pa.	Robert F. Kelly	10/27/2010	Collective	No
King v. Koch Foods of Mississippi, LLC, 3:06-cv-00301-DPJ	S.D. Miss.	Daniel P. Jordan	11/29/2010	Collective	Yes
McEvoy v. The Container Store, Inc., 1:09-cv-05490-KMW	D.N.J.	Karen M. Williams	12/17/2010	Collective	No
Hilborn v. Sanofi Pasteur, 3:09-cv-02032-ARC	M.D. Pa.	A. Richard Caputo	1/18/2011	Collective	No
Alexander/Campbell/Marrero v. KRA Corporation, 09-cv-02517/10-cv-01778/09-cv-02516-JF	E.D. Pa.	John P. Fullam	1/28/2011	Collective	Yes
Duvall v. Tri County Access Company, Inc., 2:10-cv-00118-RCM	W.D. Pa.	Robert C. Mitchell	3/30/2011	Class	No
Gibbons v. V.H. Cooper & Company, Inc., 3:10-cv-00897-JZ	N.D. Ohio	Jack Zouhary	4/18/2011	Class	Yes
Turner v. Mercy Health System, No. 003670 (January 2008 Term)	Phila.C.C.P.	Idee C. Fox	4/20/2011	Class	Yes
Vanston v. Maxis Healthy System, No. 005155 (June 2008 Term)	Phila.C.C.P.	Idee C. Fox	4/20/2011	Class	Yes
Dikon v. Dunmore Oil Company, 3:09-cv-00064-ARC	M.D. Pa.	A. Richard Caputo	4/27/2011	Collective	No
In re Tyson Foods, Inc., 4:06-cv-00143-CDL	M.D. Ga.	Clay D. Land	9/15/2011	Collective	Yes
Cover v. Feeders, Inc., 1:10-cv-00282-JEJ	M.D. Pa.	John E. Jones, III	10/11/2011	Collective	No
Muschultz v. Holcomb Behavioral Health Systems, 5:11-cv-02980-JKG	E.D. Pa.	James K. Gardner	12/15/2011	Collective	No
Johnson v. Krapf's Coaches, Inc., 2:11-cv-06974-BMS	E.D. Pa.	Berle M. Schiller	2/22/2012	Collective	No
McCray v. The Progressions Companies, Inc., 2:11-cv-07364-HB	E.D. Pa.	Harvey Bartle, III	3/2/2012	Collective	No
Slator v. Allscripts-Misys Healthcare Solutions, Inc., 1:10-cv-01069-GLS-RFT	N.D. NY	Gary L. Sharpe	4/4/2012	Collective	No
Smith v. Ameriplan Corporation, 4:10-cv-00075-ALM	E.D. Tx.	Amos L. Mazzant	8/9/2012	Collective	Yes
In re Creditron Financial Corp. (Lepkowski v. Creditron Financial Corp.), 08-11289-TPA	W.D. Pa. Bkr.	Thomas P. Agresti	8/31/2012	Collective	No
Fazio v. Automotive Training Center, 2:11-cv-06282-DS	E.D. Pa.	David R. Strawbridge	9/24/2012	Collective	No
Jean-Charles v. AAA Warman Home Care LLC, No. 110702236 (July 2011 Term)	Phila.C.C.P.	Mary Collins	9/28/2012	Class	No
Thomas v. Cescaphe Limited, LLC, 1:11-cv-04359-BMS	E.D. Pa.	Berle M. Schiller	10/3/2012	Class	No
Harkin v. LA Weight Loss, LLC, 2:12-cv-01411-AB	E.D. Pa.	Anita Brody	11/8/2012	Collective	No
Grajales v. Safe Haven Quality Care, LLC, 2010-cv-15102	Dauphin C.C.P.	Andrew H. Dowling	11/8/2012	Class	No
Grayson v. Register Tapes Unlimited, Inc., et al., 8:11-cv-00887-RWT	D. Md.	Roger W. Titus	11/26/2012	Collective	Yes
Craig v. Rite Aid Corporation 4:08-cv-02317-JEJ	M.D. Pa.	John E. Jones, III	1/7/2013	Class	Yes
Thompson v. RGT Management, Inc., 2:11-cv-02573-AJT	W.D. Tenn.	Arthur J. Tarnow	3/21/2013	Collective	Yes
Kelsh v. First Niagara Financial Group, Inc., 2:12-cv-01202-PBT	E.D. Pa.	Petresse B. Tucker	4/8/2013	Class	No
Stewart v. World Communications Charter School, 2:12-cv-04993-RB	E.D. Pa.	Ronald L. Buckwalter	5/9/2013	Class	No
Edelen v. American Residential Services, LLC, 8:11-cv-2744-DKC	D.Md.	Deborah K. Chasnow	7/22/2013	Class	Yes
LeClair v. Diakon Lutheran Social Ministries, Case No. 2010-C-5793	Lehigh.C.C.P.	Michele A. Varricchio	8/14/2013	Class	Yes

# Exhibit 2

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## Pete Winebrake

Email: [Contact Attorney Pete Winebrake](#) | Phone: 215.884.2491 | Fax: 215.884.2492

Attorney Pete Winebrake has litigated hundreds of civil lawsuits in courts throughout the United States and has recovered tens of millions of dollars for American workers and their families.

Mr. Winebrake is consistently rated a “[Super Lawyer](#)” in the annual survey of Pennsylvania attorneys published by Thompson Reuters in its well-known listing of Pennsylvania's top attorneys. In addition, the Martindale-Hubbell Peer Review Rating System has awarded Mr. Winebrake an “AV-Preeminent” ranking. This is the highest ranking available for a practicing attorney.



Mr. Winebrake is regarded as one of the Nation's most successful and prolific wage/overtime rights lawyers. He has represented thousands of employees in wage/overtime rights lawsuits throughout the United States. His practice ranges from large “class action” lawsuits brought on behalf of hundreds of employees to “individual” lawsuits brought on behalf of single employees. Mr. Winebrake believes that employees with valid legal claims deserve to be represented by competent, ethical, and hard-working counsel. In evaluating a clients' potential case, Mr. Winebrake focuses primarily on the *quality* (rather than the size) of the legal claim.

Mr. Winebrake's individual lawsuits tend to be filed in the federal courts of Pennsylvania and New York. However, his class action lawsuits have been successfully resolved in courts throughout the United States. In fact, Mr. Winebrake, often working with co-counsel, has successfully litigated class action lawsuits in federal courts in Arkansas, Georgia, Mississippi, Nebraska, New Jersey, New York, Ohio, Pennsylvania, Tennessee, and Texas. These lawsuits have resulted the recovery of well over \$50 million.

Recognizing his vast experience, many organizations have invited Mr. Winebrake to lecture on the wage/overtime rights and litigation. These organizations include, among others: Wharton School of Business at the University of Pennsylvania; Temple University School of Law; University of Pennsylvania Law School; Earle Mack School of Law at Drexel University; Pennsylvania Bar Institute; Workplace Injury Litigation Group (“WILG”); and American Association of Justice (“AAJ”) (formerly the American Trial Lawyers Association).

## Location

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### Education and Professional Background:

Pete Winebrake is a 1988 graduate (*magna cum laude*) of Lehigh University and a 1991 graduate (*cum laude*) of Temple University School of Law, where he served as Managing Editor of the *Temple Law Review*.

Upon law school graduation, from September 1991 through August 1992, Mr. Winebrake served as a law clerk to Justice William R. Johnson of the New Hampshire Supreme Court.

From September 1992 through February 1997, Mr. Winebrake served as an Assistant Corporation Counsel at the New York City Law Department's General Litigation Unit. In this capacity, he represented New York City agencies and officials in federal civil rights and employment lawsuits and other complex litigation.

In 1997, Mr. Winebrake joined the Philadelphia law firm of Ballard Spahr Andrews & Ingersoll, LLP as a litigation associate. There, he worked on complex litigation matters in the federal and state courts.

In 1999, Mr. Winebrake returned to public service, joining the Philadelphia Law Department. In this capacity, he represented City agencies and officials, including former Mayor Edward Rendell, in high-profile and complex federal civil rights matters. In 2001, Mr. Winebrake was appointed Chief Deputy City Solicitor in charge of the Philadelphia Law Department's Labor and Employment Unit. As the City's chief labor and employment lawyer, Mr. Winebrake managed a staff of eleven attorneys and oversaw all municipal labor and employment matters for the City of Philadelphia.

In 2002, Mr. Winebrake joined the Philadelphia law firm of Trujillo Rodriguez & Richards, LLC. There, Mr. Winebrake litigated and resolved a wide variety of complex lawsuits arising under federal and state wage and hour, employment, and civil rights laws. In January 2007, Mr. Winebrake founded The Winebrake Law Firm. His Firm concentrates on Federal Court litigation seeking to vindicate the rights of employees under the Fair Labor Standards Act ("FLSA") and similar state wage and hour laws. These lawsuits are brought both as individual cases on behalf of one or more workers and as class/collective actions on behalf of large numbers of similarly situated workers.

### Awards:

As stated above, Mr. Winebrake has consistently been recognized as a "Super Lawyer" in the annual survey of Pennsylvania attorneys published in Philadelphia Magazine. In addition, the Martindale-Hubbell Peer Review Rating System has given Mr. Winebrake an "AV-Preeminent" ranking. This is the highest ranking available for a practicing attorney.

In 1996, the Bar Association of the City of New York presented Mr. Winebrake with its annual prize for outstanding achievement as a municipal lawyer.

In 2001, the Fraternal Order of Police presented Mr. Winebrake with an award in recognition of his unselfish commitment to law enforcement and the citizens of Philadelphia.

In 2005, the Pennsylvania Statewide Latino Coalition presented Mr. Winebrake with an award recognizing his tireless efforts fighting for the civil rights of Pennsylvania's Latino community.

### Other:

Mr. Winebrake has been appointed by the Federal Court to serve on the Mediation Panel of the U.S. District Court for the Middle District of Pennsylvania.

Mr. Winebrake has published articles in various publications, including the Temple Law Review, the Detroit College of Law Review and the Pennsylvania Township News.



*Winebrake & Santillo, LLC serves clients in Pennsylvania,  
New Jersey and New York, and throughout the United States.*

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## Andrew Santillo

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### Education and Professional Background

Andrew Santillo is a 1998 graduate of Bucknell University and a 2004 graduate of the Temple University School of Law, where he served as Editor-in-Chief of the Temple Political & Civil Rights Law Review.

Upon graduation, Mr. Santillo joined the Philadelphia law firm of Trujillo Rodriguez & Richards, LLC as an associate. There, Mr. Santillo participated in the litigation of complex lawsuits arising under federal and state wage and hour, employment, securities and antitrust laws. In May 2008, Mr. Santillo joined Winebrake & Santillo as an equity partner.



During his career Mr. Santillo has represented workers in over 200 lawsuits alleging violations of federal and state wage and overtime law. Mr. Santillo has been named class counsel and/or co-class counsel in collective actions under the Fair Labor Standards Act by the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, and the District of Maryland. Mr. Santillo has also been named co-class counsel by the Philadelphia Court of Common Pleas and the Dauphin County Court of Common Pleas in class actions asserting claims under Pennsylvania law. In addition, he has played active roles in a number of nationwide collective actions and/or multidistrict litigation ("MDL") under the Fair Labor Standards Act, including, *In re Pilgrim's Pride Fair Labor Standards Act Litig.*, 06-cv-01832-HFB (W.D. Ark.) (MDL); *In re Tyson Foods Inc Fair Labor Standards Act Litig.*, 4:07-md-01854-CDL (M.D. Ga.) (MDL); *Craig v. Rite Aid Corporation*, 08-cv-02317-JEJ (M.D. Pa.) (conditionally certified nationwide collective action); *Bell et al. v. Citizens Financial Group, Inc., et al.*, 10-cv-00320-GLL (W.D.Pa.) (conditionally certified nationwide collective action); and *Martin et al. v. Citizens Financial Group, Inc., et al.*, 10-cv-00260-MSG (E.D.Pa.) (conditionally certified nationwide collective action).

Mr. Santillo is a member of the bars of the Commonwealth of Pennsylvania and the State of New Jersey, and is admitted to practice before the U.S. District Court for the District of New Jersey, the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the Western District of Pennsylvania, the Northern District of Illinois and the Third Circuit Court of Appeals.

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## Other

In 2004, Mr. Santillo authored the comment, "National Wrestling Coaches Association v. United States Department of Education: The Potential Takedown of the Current Application of Title IX to Intercollegiate Athletics," 13 Temp. Pol. & Civ. Rts. L. Rev. 187 (Fall 2003). He is also a member of the National Employment Lawyers Association (NELA).

Mr. Santillo has served as a panelist discussing wage an hour issues at the National Employment Lawyers Association's ("NELA") 2013 spring conference titled "Preventing Wage Theft: A Two-Day Guide to Litigating Cases Involving Wages, Hours & Work" in Chicago, Illinois and its 2011 Annual Convention in New Orleans, Louisiana as well as the Workers' Injury Law & Advocacy Group ("WILIG") 2011 and 2012 Advanced Wage & Hour seminars in Cleveland, Ohio. He has also been a panelist at seminars sponsored by the Philadelphia Chinatown Development Corporation and the Temple Law Alumni Association.

In 2013, Mr. Santillo was named as a Pennsylvania "[Super Lawyer](#)" in the annual survey of Pennsylvania attorneys published by Thompson Reuters in its well-known publications regarding Pennsylvania's top attorneys. This follows Mr. Santillo's previous recognition as a Pennsylvania "[Rising Star](#)" by Thompson Reuters in 2011 and 2012.

In 2008, Mr. Santillo was appointed by the Radnor Township Board of Commissioners to serve two terms on the Radnor Township Parks and Recreation Board.

*Winebrake & Santillo, LLC serves clients in Pennsylvania,  
New Jersey and New York, and throughout the United States.*

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## Mark Gottesfeld

Associate

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### Education and professional background

Mark Gottesfeld is a 2006 graduate of Lehigh University (*magna cum laude*) and a 2009 graduate of the inaugural class of Drexel University Earle Mack School of Law (*cum laude*), where he served as an editor on the *Drexel University Earle Mack School of Law Review*.

During law school, Mr. Gottesfeld served as a Judicial Intern to Pennsylvania Superior Court Judge Jack A. Panella. Upon graduation, Mark worked at the personal injury law firm of Saltz, Mongeluzzi, Barrett & Bendesky, P.C. in Philadelphia.

Mr. Gottesfeld is admitted to the Pennsylvania, New Jersey and New York Bars, and is admitted to practice before the Eastern District of Pennsylvania, the Middle District of Pennsylvania, and the District Court for the District of New Jersey.



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